SHANNON & WILSON, INC.
GEOTECHNICAL AND ENVIRONMENTAL CONSULTANTS

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April 5, 1995

Ms. Cynthia Hutchison
USEPA Region VII
726 Minnesota Avenue
Kansas City, Kansas
66101

REEVALUATION OF REQUIREMENTS

STEELCOTE FACILITY
ST. LOUIS, MISSOURI

Dear Ms. Hutchison:

The purpose of this letter is to request that the requirements for additional investigation/remediation at the referenced site be terminated as the conditions of the Administrative Order of Consent (AOC) have been satisfied. As you are aware, Item 26c of the AOC provides a mechanism whereby specific parameters are eliminated as Contaminants of Concern (COC) if they are not detected in ground water samples. As a result, most of the COCs have been eliminated. The remaining COCs are either background or have been detected at concentrations less than Maximum Contaminant Levels (MCL).

Prior to implementation of the Plan of Study (March 20, 1992), a list of COCs was compiled from records of chemical use at the site. The Plan of Study, including the list of COCs was reviewed and approved by the USEPA. This list of COCs constituted the parameters for which soil and quarterly ground water samples were analyzed. As a result of this monitoring and the non detection of some of the parameters, the COC list was reduced to:

Xylene	Toluene	Lead	Formaldehyde
Phthalate	Chromium	Barium	

The reduction of the COC list was documented in our Site Investigation Report (September 30, 1993). In this same report, we presented arguments for the elimination of formaldehyde, phthalate, lead, barium and chromium. Though you did not disagree with our arguments, you requested that we continue to monitor these parameters. This request, with which we complied, was based upon your belief that the initial ground water monitoring wells were not constructed in a fashion which would allow for elimination of these parameters.

Based on an evaluation of information contained in the Site Investigation Report, on information obtained from subsequent field work (hydrologic and cone penetrometer testing), on the identification of two potential sources of contamination at the site, and on your concerns regarding the construction of the initial set of wells, a second phase of field work was undertaken. The plan for this investigation, which was formally identified as Addendum #3 to the Plan of Study, was also reviewed and approved by the USEPA. The plan specified construction of four new wells in the vicinity of the potential sources (Attachment #1) and the abandonment of the existing wells.

The construction work described in Addendum #3 has been completed and three quarterly sampling/analyses events have been conducted. The results of sample analyses (Attachment #2) indicate that work on the site should cease

11500 OLIVE BOULEVARD • SUITE 276
SAINT LOUIS, MISSOURI 63141 • 7126
314 • 872 • 8170 FAX 314 • 872 • 8178

and that no additional investigation or remediation is necessary. Our rationale for this conclusion is as follows:

1. Xylene, toluene, chromium, lead, phthalate and formaldehyde were not detected in any of the wells from the third quarter sampling and analysis. All should be eliminated as COCs as per the AOC. Furthermore, the concentrations in the groundwater of the remaining COC, barium, have never exceeded its MCL.

2. The apparent increase in metals concentrations in the second quarter of sampling is likely due to a one-time change in sample collection procedure. Normally, water samples are collected and placed into clean, empty plastic sample bottles provided by the laboratory. The samples are filtered at the laboratory, and then analyzed.

   For the second quarter only, the bottles sent by the laboratory were not empty, but contained acid. We believe that the acid leached some metals out of the sediment in the samples, causing the apparent increase in metals levels.

   The results from the first and third quarters are consistent with this hypothesis; they are very similar to each other, and lower than the second quarter results. The first and third quarter results are also more consistent with the results from the first phase of the investigation (see Table 7, 9/30/93 Final Report) than the second quarter results. Therefore, the second quarter metals results are suspect and should not be relied upon.

3. At a minimum, well H should be abandoned. Even including the suspect second quarter results, the only detectable species were metals, and the concentrations found were below MCLs (except for lead, for which no MCL currently exists).

4. In addition, results of monitoring in the vicinity of the closed UST (wells I, J, and K) indicate that COCs were either not detected or were detected at levels below MCLs (again, except for lead, which has no MCL).

5. The source(s) of lead in ground water samples at the site is/are offsite. This conclusion was presented in the Site Investigation Report and levels detected in the new wells are consistent with those previously detected.

We would appreciate your prompt attention to this matter. Our next sampling event is scheduled for May and is followed by a report. It is our opinion that neither activity is necessary. If you have any questions, please call.

Very truly yours,

SHANNON & WILSON, INC.

Donald J. McQueen, PG, RGP
Vice President

enc: Attachment #1, Location of New Ground Water Monitoring Wells
Attachment #2, Summary of Ground Water Monitoring Analyses for the Last Three Quarters

cc: A. McMahon
D. Neidt
G. Neidt

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